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8 Attorneys for Debtor

9
10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12

13 In Re: Case No. 25-10088 WJL

14 Kingsborough Atlas Tree Surgery, Inc. Chapter 11

15 Debtor.

16 DECLARATION OF MICHAEL FALLON
17 IN SUPPORT OF MOTION FOR
18 AUTHORITY TO SELL PERSONAL
19 PROPERTY

20 I, Michael Fallon, declare that I am an attorney licensed to practice in this court and that I
21 am personally familiar with the statements in this declaration. If called as a witness in these
22 proceedings I could and would testify as follows:

23 Following the hearing on the motion for authority to sell the customer list, I was
24 instructed by the Debtor to send out a notice to the largest tree service companies in Northern
25 California of the Debtor's intention to sell its customer list. On May 15, 2025, the attached
26 Notice of Motion for Authority to Sell Personal Property was sent out to tree service companies
27 in Northern California. (Dkt Nos 128, 128-1). I have not, as yet, had any response to the said
28 notice.

I declare under penalty of perjury the foregoing is true and correct and that this
declaration was executed by me on May 20, 2025, at Santa Rosa, California.

/s/ Michael C. Fallon

Michael C. Fallon

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re:	Case No. 25-10088 WJL
Kingsborough Atlas Tree Surgery, Inc.	Chapter 11
Debtor.	NOTICE OF MOTION FOR AUTHORITY TO SELL PERSONAL PROPERTY

Kingsborough Atlas Tree Surgery, Inc. ("Debtor") has filed a motion for authority to sell Debtor's Customer List at the sale price of \$200,000, all cash. You have been identified by the Debtor as a company that might have an interest in purchasing the customer list, consisting primarily of residential customers, that has been developed by the Debtor since the company started operating in 1982.

If you are interested in purchasing the client list you should contact the Debtor's counsel, Michael Fallon, not later than Wednesday, May 28, 2025. Michael Fallon can be reached at 707.546.6770 or by email at mcfallon@fallonlaw.net.

If one or more parties expresses an interest in purchasing the client list, an auction sale will be conducted at a date and time on not less than ten days notice to the parties who wish to participate in the auction sale.

Dated: May 15, 2025

/s/ Michael C. Fallon
Michael C. Fallon
Attorney for Debtor

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Case No. 25-10088 WJL
Kingsborough Atlas Tree Surgery Inc. Chapter 11
Debtor.

CERTIFICATE OF SERVICE

I, Merla Anders, declare:

I am a citizen of the United States and resident of Sonoma County, California, I am over the age of eighteen and not a party to the within entitled action; my business address is 100 E Street, Suite 219, Santa Rosa, California 95404.

On May 15, 2025, I served the NOTICE OF MOTION FOR AUTHORITY TO SELL PERSONAL PROPERTY on the said action by placing a true copy thereof, enclosed in a sealed envelope, with postage thereon fully prepaid in the United States mail at Santa Rosa, California and/or via email addressed as follows:

SEE ATTACHED LIST

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 15, 2025, at Santa Rosa, California.

/s/ Merla Anders

MERLA ANDERS

Arborworks
40266 Junction Drive
Oakhurst, Ca. 93644
559-641-2434
information@arborworksinc.com

West Coast Arborist
2200 E. Via Burton Street
Anaheim, Ca. 92806
800-521-3714
corporate@wcainc.com

Signature Tree Solutions
1250 Church Street, Suite R2
St. Helena, Ca. 94574
707-963-3333
info@signaturetreesolutions.com

Wright Tree Service
Post Office Box 1718
Des Moines, Iowa, 50306
800-882-1216

Mountain Enterprises
950 Iron Point Road, Suite 210
Folsom, Ca. 95630
530-626-4127
MFE@Mtfent.com

Professional Tree
2828 8th Street
Berkeley, Ca. 94710
510-549-3954

Bartlett Tree Service
22725 Eighth Street East, Suite B
Sonoma, Ca. 95476
707-935-3220
sonomaoffice@bartlett.com

Vema
Santa Rosa, Napa and Surrounding Areas
707-510-4306
Office@Vematreeservicellc.com